



## Nebraska Public Power District

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NLS2006077  
October 16, 2006

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

**Subject:** 120-Day Response to NRC June 20, 2006, Order Requiring Compliance with Key Radiological Protection Mitigation Strategies (EA-06-137)  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Letter from J. E. Dyer, U.S. Nuclear Regulatory Commission, to Holders of Licenses for Operating Power Reactors listed in Attachment 1 to the Order, dated June 20, 2006, "Issuance of Order Requiring Compliance with Key Radiological Protection Mitigation Strategies"
  2. Letter from J. E. Dyer, U.S. Nuclear Regulatory Commission, to Holders of Licenses for Operating Power Reactors listed in the Enclosure, dated August 28, 2006, "Order Requiring Compliance with Key Radiological Protection Mitigation Strategies"

The purpose of this letter is to provide Nebraska Public Power District's (NPPD's) 120-day response to the U.S. Nuclear Regulatory Commission (NRC) Order of June 20, 2006, (Reference 1) and subsequent correspondence (Reference 2) regarding implementation of that Order.

On June 20, 2006, the NRC issued an Order that modified the license of Cooper Nuclear Station. The Order required NPPD to implement certain key radiological protection mitigation strategies that are identified in Attachment 2 to the Order and to incorporate them into security plans, safeguards contingency plans, guard training and qualification plans, and/or emergency plans, as appropriate. The Order also required NPPD to complete the changes to site plans necessary to fully implement the key mitigation strategies and notify the NRC within 120 days of the date of the Order by sending the changed plan pages to the NRC.

NPPD hereby confirms that the key radiological protection mitigation strategies (described in Attachment 2 to the Enclosure to the Reference 1 letter) have been incorporated into site procedures and initial and recurring operations staff training programs, as required by the Order.

### COOPER NUCLEAR STATION

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Subsequent to issuing the Order, the NRC determined (Reference 2) that, instead of incorporating the required strategies in the aforementioned plans, the following license condition would be sufficient to satisfy the Order's substantive requirements:

[Licensee] shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

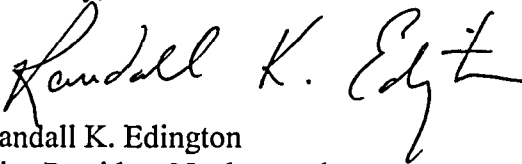
NPPD agrees with the NRC's proposal to amend the operating license to include this new condition. NPPD understands that in lieu of the plan changes detailed in the Order, the NRC will issue a conforming amendment (essentially identical to the condition above) to Cooper Nuclear Station to satisfy the Order's substantive requirements.

This letter contains no new commitments.

If you have any questions or require additional information, please contact Mr. Paul Fleming, Licensing Manager, at (402) 825-2774.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 16th day of October 2006.

Sincerely,



Randall K. Edington  
Vice President Nuclear and  
Chief Nuclear Officer

/lb

cc: Director, Office of Nuclear Reactor Regulation  
USNRC

Regional Administrator  
USNRC - Region IV

Cooper Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC - CNS

NPG Distribution

CNS Records

**ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©**

Correspondence Number: NLS2006077

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		